

UNITED STATES DISTRICT COURT
DISTRICT OF NEW JERSEY

IN RE VALSARTAN, LOSARTAN, AND IRBESARTAN PRODUCTS LIABILITY LITIGATION	MDL No. 2875
THIS DOCUMENT RELATES TO ALL CASES	HON. ROBERT B. KUGLER CIVIL NO. 19-2875 (RBK)

**CERTIFICATION OF C. BRETT VAUGHN IN SUPPORT OF PLAINTIFFS' MOTION
TO STRIKE DEFENDANTS' EXPERT MICHAEL B. BOTTORFF'S
NEW AND ALTERED GENERAL CAUSATION OPINIONS**

C. BRETT VAUGHN, hereby certify as follows:

1. I am an attorney at law within the State of Kansas with the Hollis Law Firm, P.A., and serve as a Court-appointed Member of the Plaintiffs' Executive Committee. I am fully familiar with the facts and circumstances of these actions. I make this certification in support of Plaintiffs' motion to strike Dr. Bottorff's new and altered general causation opinions.

2. Attached hereto as **Exhibit A** is a true and accurate copy of pages 12-18 from the February 2, 2022 CMC.

3. Attached hereto as **Exhibit B** is a true and accurate copy of Dr. Bottorff's Class Certification Expert Report.

4. Attached hereto as **Exhibit C** is a true and accurate copy of pages 8-23 from Dr. Bottorff's March 25, 2022, deposition.

Respectfully Submitted,

Dated: May 3, 2022

By: /s/ C. Brett Vaughn
C. Brett Vaughn RN, BSN, JD
Hollis Law Firm
Attorneys for Plaintiffs